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Attorney for Defendants
INNETRA P.C. and Elna Paulette Belle

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)

DISH NETWORK L.L.C. a Colorado
Limited Liability Company;

Plaintiff,

v.

INNETRA PC, a United Kingdom
Limited Partnership; Elna Paulette
Belle, an individual.

Defendant.

Case No. 5:25-cv-03933-NW

**JOINT STIPULATION TO EXTEND
DEFENDANTS' TIME TO FILE A
RESPONSIVE PLEADING;
[PROPOSED] ORDER**

Judge: The Honorable
District Judge Noel Wise

Complaint Filed: May 5, 2025

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

IT IS HEREBY STIPULATED, by and between the parties, Plaintiff DISH Network L.L.C. (“DISH”) and Defendants Innetra P.C. (“Innetra”) and Elna Paulette Belle (collectively “Defendants”) (collectively, the “Parties”) to allow Defendants a fourteen (14) day extension to file a responsive pleading:

WHEREAS DISH filed its Complaint on May 5, 2025 [Dkt. 1];

WHEREAS on information and belief according to Plaintiff’s counsel both Defendants were served on June 5, 2025 with an answer or a responsive pleading due on June 26, 2025;

WHEREAS Torani Law, P.C. has been recently retained by Defendants and needs additional time to review the Complaint and file an answer or a responsive pleading;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties to this action, through their counsel of record, that good cause exists, and it is therefore in the best interest of all Parties that:

Defendants be provided up to and including July 7, 2025 to file an answer or a responsive pleading.

IT IS SO STIPULATED.

1 June 23, 2025

By: /s/ Ani Martirosian
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Glendale, CA 91203
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Attorney for Defendants Innetra P.C. and
Elna Paulette Belle

8 June 23, 2025

By: /s/ Stephen M. Ferguson
Stephen M. Ferguson (*pro hac vice*)
stephen.ferguson@hnbllc.com
Timothy M. Frank (CA Bar No. 263245)
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Attorneys for Plaintiff Dish Network L.L.C.

PROOF OF SERVICE

I am over eighteen (18) years of age, employed in California, and not a party to this action. My business address is 655 N. Central Ave, Floor 17, Glendale, CA 91203. I hereby certify that on June 23, 2025, I served the following documents:

**JOINT STIPULATION TO EXTEND DEFENDANTS' TIME TO FILE A
RESPONSIVE PLEADING; [PROPOSED] ORDER**

By delivering the document(s) to:

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1 Electronic Filing upon the parties, the assigned judge, and any registered user
2 in the case:

3 I declare, under penalty of perjury under the laws of the United States, that the
4 foregoing is true and correct. Executed June 23, 2025.

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8 _____
9 Ani Martirosian
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